

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:

YOLANDA NEVAREZ,

Debtor.

Chapter 7

Case No. 15- 36082

**NOTICE OF FILING**

TO: See attached Service List

**PLEASE TAKE NOTICE** that on **Sunday, January 17, 2015** the undersigned caused to be filed with the Clerk of the United States Bankruptcy Court the attached *Debtor's Response to Motion of Trustee to Dismiss and for Sanctions*.

Dated: January 17, 2016

Respectfully submitted,

**YOLANDA NEVAREZ**

By: */s/Nikola Duric*

\_\_\_\_\_  
One of her Attorneys

Nikola Duric  
Duric Law Offices  
810 Busse Highway  
Park Ridge, IL 60068  
Telephone: 847/ 692-3522  
Duriclaw@att.net

**Certificate of Service**

I, Nikola Duric, an attorney, certify that as of the date hereof, I caused a copy of (a) the foregoing *Notice of Filing* (b), the related *Debtor's Response to the Motion of Trustee to Dismiss and for Sanctions* to be served on the foregoing Service List via the Court's ECF System on those parties entitled to electronic service.

Date: January 17, 2016

/s/Nikola Duric

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**Service List:**

Office of the United States Trustee  
219 S. Dearborn  
Room 873  
Chicago, IL 60604

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE:

YOLANDA NEVAREZ,

Debtor.

No. 15- 36082  
Chapter 7

**RESPONSE TO MOTION OF TRUSTEE FOR SANCTIONS**

DEBTOR YOLANDA NEVAREZ, by undersigned counsel, provides the following Response to the Motion of Trustee to Dismiss and for Sanctions:

1. The Trustee has filed a motion to dismiss and for sanctions. The Trustee noticed said motion for January 7, 2016.
2. Based on undersigned counsel's observance of Orthodox Christmas on said date, counsel was not in court. However, counsel did request attorney Adrian Vuckovich to attend court on said date and advise the Court of the reason for the absence.
3. Attorney Duric recently was granted access to electronically file documents with the Court's electronic case filing system.
4. The instant Chapter 7 Petition was the first Chapter 7 Petition filed by undersigned counsel utilizing the Court's ECF system.
6. Counsel did not receive the additional documents for filing with the Chapter 7 Petition from Debtor Yolanda Nevarez.
7. Counsel has gained valuable education from the case at bar as demonstrated by the recently filed Chapter 7 Petition on behalf of his client Chad Kowal (In Re: Kowal Case No. 16-

00657).

8. The undersigned counsel respectfully requests that this Court consider the foregoing matters.

9. In the interests of resolving this matter in good faith counsel has communicated with the Trustee and agrees to pay the monetary amount requested and direct said payment to such party as ordered by this Court.

Dated: January 17, 2016

Respectfully Submitted,

YOLANDA NEVAREZ

By: /s/ Nikola Duric  
One of her Attorneys

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